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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

November 8, 2004

OK

TO: Internal File

THRU: Gregg Galecki, Team Lead *AG*

FROM: Wayne H. Western, Environmental Scientist, Engineering and Bonding *WHW*

RE: IBC- Modification to Lease U-68082, Genwal Resource Inc., Crandal Canyon Mine, C/015/0032, Task ID #2057

SUMMARY:

Genwal Resources Inc., submitted amendment 2057, which involves the addition of 120-acres as part of an incidental boundary change. The Permittee wanted to include the 120-acres in order to recover coal that would be sterilized by the current mine plan. The amendment contains no changes to the surface facilities and only minor changes to the permit area.

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TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

PERMIT AREA

Regulatory Requirements: 30 CFR 783.12; R645-301-521.

Analysis:

The information in the 120-acre IBC is adequate for the Division to identify the permit area expansion. The area for the 120-acre IBC is show in Section 5.21.13 of the MRP. The 120-acre addition consists of W1/2NW1/4 and the NW1/4SW1/4 of Section 32 T. 15S., R. 7E.

Findings:

The information provided is adequate to meet the requirements of this permit area section in the environmental resource information.

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Affected Area Boundary Maps

The affected area boundary maps are inadequate to meet all of the requirements of the R645 regulations. Genwal Resources did not submit maps at an adequate scale. R645-301-141 requires that maps of the affected area/permit boundaries are at a scale of 1 to 24,000 or larger.

Genwal Resources submitted maps at a scale of 1-inch equals 25,000 feet, which is a scale of 1 to 30,000.

Existing Structures and Facilities Maps

The 120-acre IBC submittal did not effect the existing structures and facilities maps.

Existing Surface Configuration Maps

The 120-acre IBC submittal did not effect the existing surface configuration maps.

Mine Workings Maps

Map 5-1, Old Works Plate, shows the locations of the old workings in and around the Crandal Canyon Mine. Map 5-1, does not show the location of any old workings by the South Crandall Lease or the 120-acre IBC.

Permit Area Boundary Maps

The permit area boundary maps are inadequate to meet all of the requirements of the R645 regulations. Genwal Resources did not update all of the Plate 5-2, BC, Crandall Canyon #1 Mine and South Crandall Mine Mine Plan.

Findings:

The information in the 120-acre IBC amendment does not meet the minimum requirements of maps, plans and cross sections of the resource information part of the environmental section of the regulations. Before approval, the Permittee must provide the following in accordance with:

R645-301-141 The Permittee must include maps of the permit and adjacent areas at a scale of 1 to 24,000 or greater and update all maps that show the permit boundaries such as Plat 5-2 BC.

OPERATION PLAN

COAL RECOVERY

Regulatory Reference: 30 CFR 817.59; R645-301-522.

Analysis:

The information in the Genwal Resources submittal for the 120-acre IBC is adequate to meet the minimum requirements for the coal recovery regulations. Genwal Resources added the

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120 acres in order to recover a small amount of coal in the 1st Right Panel. They permitted additional areas because of the possibility of additional mining to the north.

The coal to the north is low (5 feet or less). The Permittee determined that a drilling program would be inadequate to determine if the area is minable. They will do exploration with a continuous miner. If mining is feasible, Genwal Resources will develop additional panels to the north.

The coal in the 120-acre IBC is bounded on the north and to the east by outcrops. The only practical access to the coal is through the Genwal Mine. The coal in the 120-acre IBC is marginal due to the seam thinness. The addition of the 120-acre IBC will allow the Permittee the ability to recover coal that would otherwise be sterilized.

The Division considers the additional of the 120-acre IBC a tool for the Permittee to maximize the economic recovery of the coal resources.

Findings:

The information in the 120-acre IBC submittal is adequate to meet the minimum requirements of the coal resource regulations.

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Analysis:

Subsidence Control Plan

The updated subsidence plan that was submitted as part of the 120-acre IBC is inadequate to meet the minimum requirements for the subsidence control plan as required by the regulations, because Map 5-5 does not show the extent of the maximum subsidence limits. That information was on previous maps and needs to be included on the subsidence map for the 120-acre IBC.

The Permittee was able to meet part of the subsidence control plan requirements in connection with the 120-acre IBC because they included the following:

- All mining in the 120-acre IBC will be done in the Hiawatha Seam. The purpose of the 120-acre addition is to allow the Permittee to mine coal that would otherwise be inaccessible.
- Map 5-2 (H) shows the location of the mining that will occur in the 120-acre IBC.

- Map 5-5, Subsidence Control Point Location, shows that no new subsidence control points were added for the 120-acre IBC. The area has two existing monitoring points. Because of the small area the Division believes that additional monitoring points are not needed.
- Map 5-5 does not show the extent of the maximum subsidence limits. That information was on previous maps and needs to be included on the subsidence map for the 120-acre IBC.

Performance Standards For Subsidence Control

Findings:

The information in the South Crandall amendment does not meet the minimum requirements of this Subsidence Control Plan. Before approval, the Permittee must provide the following in accordance with:

R645-301-525.110, The Permittee must update Map 5-5 in the 120-acre IBC so that areas of maximum possible subsidence are shown. Previous versions of Map 5-5 showed that information.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Affected Area Maps

The Permittee did not indicate that there are any additional areas where they may seek permits. Therefore, the affected area and the permit area are the same. The Permittee showed the inclusion of the 120-IBC on several maps including Plate 5-2 (H).

Mine Workings Maps

The Permittee showed mine active and proposed mine workings for the 120-IBC on Plate 5-2 (H). The abandoned mine workings are shown on Plate 5-1. No abandoned workings are shown to be near the 120-acre IBC.

Findings:

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The information provided is adequate to meet the requirements of this section of the regulations.

RECOMMENDATIONS:

The Division should deny the amendment until all of the above mentioned deficiencies have been adequately addressed.

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